

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DIRECTV, Inc.	)	Case No.: 04-12404-PBS
	)	
Plaintiff,	)	
	)	<b>PLAINTIFF'S MOTION TO EXTEND</b>
vs.	)	<b>TIME TO MOVE FOR DEFAULT</b>
	)	<b>JUDGMENT OR TO ASSENT TO</b>
Nelson Martins	)	<b>OPENING OF DEFAULT</b>
	)	
Defendant	)	

NOW COMES Plaintiff, DIRECTV, Inc., to the above-captioned case respectfully requests that this Court extend the deadlines for the Plaintiff to move for default judgment or to assent to the opening of the default to March 1, 2005.

As grounds, the Plaintiff states:

1. Plaintiff's Counsel has been contacted by an attorney for the Defendant, Attorney Todd Bennett, of Corrigan, Bennett & Belfort, PC, Wilmington, MA.
2. Plaintiff's Counsel and Defendant's Counsel are in serious substantive negotiations to either possibly resolve this matter or reach an agreement to request an opening of the default.
3. Attorney Bennett assents to this motion.

In further support of this motion, see affidavit of John M. McLaughlin

Respectfully Submitted for the Plaintiff,  
DIRECTV, Inc.  
By Its Attorney

2/4/05  
Date

/s/ John M. McLaughlin  
John M. McLaughlin (BBO: 556328)  
**Green, Miles, Lipton & Fitz-Gibbon**  
77 Pleasant Street  
P.O. Box 210  
Northampton, MA 01061-0210  
(413) 586-0865

**CERTIFICATE OF SERVICE**

I, John M. McLaughlin, attorney for the Plaintiff, hereby certify that on the 4th day of February 2005, a copy of the foregoing motion and affidavit were sent via electronic mail to

Attorney Todd J. Bennett  
toddjbennett@hotmail.com

/s/ John M. McLaughlin  
John M. McLaughlin

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DIRECTV, Inc.

Plaintiff

vs.

Nelson Martins

Defendant

) Case No.: 04-12404-PBS

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**AFFIDAVIT OF ATTORNEY IN  
SUPPORT OF PLAINTIFF'S MOTION  
TO EXTEND TIME TO MOVE FOR  
DEFAULT JUDGMENT OR TO ASSENT  
TO OPENING OF DEFAULT**

Now comes John M. McLaughlin, Attorney for the Plaintiff in the above-entitled action,  
and, on oath, states the following:

1. I have been contacted by an attorney for the Defendant, Attorney Todd Bennett,  
of Corrigan, Bennett & Belfort, PC, Wilmington, MA.
2. Defendant's Counsel and I are in substantive negotiations to either possibly  
resolve this matter or reach an agreement to request an opening of the default.
3. Defendant's Counsel assents to this motion.
4. I respectfully request until March 1, 2005 to move for default judgment or to  
assent to the opening of the default.

Subscribed and sworn to, under the pains and penalties of perjury.

Respectfully Submitted for the Plaintiff,  
DIRECTV, INC.  
By Its Attorney,

2/4/05  
Date

/s/ John M. McLaughlin

John M. McLaughlin (BBO: 556328)  
**Green Miles Lipton & Fitz-Gibbon**  
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P.O. Box 210  
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